

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 05-10145-NG
)	
MICHAEL FOWLER)	

JOINT MOTION TO CONTINUE
STATUS CONFERENCE

Defendant, Michael Fowler, and the government respectfully move that this Court continue the Status Conference, presently scheduled for January 4, 2007, to March 8, 2007 or as soon thereafter as is convenient to the Court. As support of this motion, the parties state that the instant matter is a companion matter to the prosecution in United States v. Michael Fowler, Criminal No. 04-10308-JLT. Defendant has pled guilty before Judge Tauro in that matter and awaits sentencing. By plea agreement, the instant matter is considered relevant conduct to the matter before Judge Tauro and the government will recommend a concurrent sentence before this Court. The plea agreement therefore requires that the Judge Tauro matter be disposed of prior to sentencing in this Court. The parties request a two-month continuance and anticipate that defendant will have been sentenced by Judge Tauro before that time has elapsed.

The parties agree that the Court's prior orders have excluded time up to and including January 4, 2007. The parties further agree that the Court should exclude time up to and

including the rescheduled Status Conference in the interests of justice to allow the parties to implement the plea agreement.

Respectfully submitted,

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UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I, Timothy G. Watkins, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and on Michael Fowler by first class mail, on January 5, 2007.

/s/ Timothy G. Watkins
Timothy G. Watkins